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6 Attorney for BRYAN JAMES GALLAGHER

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 BRYAN JAMES GALLAGHER.
14 Defendant.

Case No. 2:15-cr-028-JAD-PAL

STIPULATION TO MODIFY A
CONDITION OF PRETRIAL
RELEASE

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16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Monique Kirtley,
19 Assistant Federal Public Defender, counsel for Bryan James Gallagher, to modify the condition of
20 pre-trial release.

21 This Stipulation is entered into for the following reasons:

22 1. Defendant Gallagher was placed on Pretrial Supervision on March 2, 2015. One of
23 the conditions of his pretrial release was that Mr. Gallagher's travel was restricted to Clark County,
24 Nevada

25 2. The parties respectfully request that this Court amend Mr. Gallagher's travel
26 restriction to allow him to travel within the continental United States. Mr. Gallagher's father will
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1 be undergoing back surgery at the end of this week and Mr. Gallagher's help is needed to help care
2 for his father. Additionally, Mr. Gallagher's family lives outside of the State of Nevada and with
3 the holiday season approaching, Mr. Gallagher and his family would like be able to celebrate the
4 pending holidays together.

5 3. Mr. Gallagher has been in full compliance with his other terms of supervision

6 4. The Pretrial Service Officer does not oppose the modification of Mr. Gallagher's
7 travel restrictions to allow him to travel within the continental United States.

8 5. The United States Attorney does not oppose modifying Mr. Gallagher's travel
9 restrictions to allow him to travel within the continental United States.
10

11 DATED this 29th of October, 2015
12

13 RENE L. VALLADARES
14 Federal Public Defender

15 /s/ Monique Kirtley
16 By _____
17 MONIQUE KIRTLEY
18 Assistant Federal Public Defender
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20

DANIEL G. BOGDEN
United States Attorney

/s/ Phillip N. Smith, Jr.
By _____
PHILLIP N. SMITH, JR.
Assistant United States Attorney

21 IT IS SO ORDERED.
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23 DATED this 25th day of October, 2015.
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25 UNITED STATES MAGISTRATE JUDGE
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